

MARIA DRYDEN (SBN 215758)
DLA PIPER LLP (US)
400 Capitol Mall, Suite 2400
Sacramento, CA 95814-4428
Tel: 916.930.3200
Fax: 916.930.3201
Email: maria.dryden@dlapiper.com

Attorneys for Plaintiff
CHRISTIAN R. WILLIAMS

FILED

JOHN C. BEIRS, COUNTY COUNSEL (SBN 144282)
By: David A. Silberman, Deputy (SBN 211708)
Hall of Justice and Records
400 County Center, 6th Floor
Redwood City, CA 94063
Telephone: (650) 363-4749
Facsimile: (650) 363-4034
E-mail: dsilberman@co.sanmateo.ca.us

Attorneys for Defendants
COUNTY OF SAN MATEO, et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTIAN R. WILLIAMS

Case No. CV-03-5158 RMW

Plaintiff,

**STIPULATION AND [] ORDER RE
CASE MANAGEMENT CONFERENCE**

vs.

COUNTY OF SAN MATEO, et al.

Defendants.

RECITALS

1. WHEREAS, this case was initially filed in 2003;

2. WHEREAS, the County filed a motion for summary judgment in March 2008, which was granted in September 2008;

3. WHEREAS, the Ninth Circuit reversed in July 2012 and Ordered that Plaintiff be appointed counsel;

4. WHEREAS, in September 2012 the District Court reopened the case, but stayed it pending appointment of counsel (and an additional four weeks following appointment);

5. WHEREAS, in January 2013 the District Court appointed counsel;

6. WHEREAS, since that time the undersigned have been diligently exploring whether the case can be resolved without further litigation;

7. WHEREAS, after ongoing conversations, the parties have reached an agreement regarding the financial terms of a proposed settlement agreement resolving this matter without further litigation;

8. WHEREAS, the parties have reached an agreement regarding the non-financial terms of a proposed settlement agreement;

9. WHEREAS, all that remains to negotiate are the final terms of the proposed settlement agreement and the parties are optimistic that the terms of the proposed settlement agreement can be resolved without further litigation;

10. WHEREAS, those conversations remain ongoing, no significant discovery has occurred, but a Case Management Conference is scheduled for January 17, 2014, a date which triggers meet and confer and filing requirements that the parties would prefer to delay until they have an opportunity to finalize the settlement agreement and exhaust current resolution efforts;

11. WHEREAS, January 17, 2014 is the fourth scheduled Case Management Conference and the parties have previously requested three continuances of the Case Management Conference in order to diligently discuss whether the case can be resolved without further litigation;

12. WHEREAS, because Plaintiff remains in civil custody, communication with him is more challenging than normal and can therefore require additional time;

13. WHEREAS, Plaintiff has been experiencing health problems causing further challenges in

WEST\245876703.1

1 communications with him;

2 **STIPULATION**

3 The parties hereby stipulate that, with the Court's agreement, the Case Management Conference
4 currently scheduled for January 17, 2014, be continued for approximately two months to facilitate
5 exhaustion and finalization of settlement discussions.

6 Dated: January 10, 2014

DLA Piper LLP (US)

7
8 By: /Maria Dryden/
9 Maria Dryden
10 Attorney for Plaintiff
CHRISTIAN WILLIAMS

11 Dated: January 10, 2014

JOHN C. BEIERS, COUNTY COUNSEL

12
13 By: /David A. Silberman/
14 David A. Silberman, Deputy
15 Attorneys for Defendants
16 COUNTY OF SAN MATEO, et al.
17
18
19
20
21
22
23
24
25
26
27
28

[] ORDER

GOOD CAUSE APPEARING, the Case Management Conference currently scheduled for January 17, 2014 is hereby continued to March 43, 2014 at 10:30 a.m., with the Joint Case Management Statement due March 16, 2014.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: FBH, 2014


RONALD M. WHYTE, JUDGE
UNITED STATES DISTRICT COURT